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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated.

**Plaintiffs,**

V.

GOOGLE LLC

## Defendant

Case No. 3:20-CV-04688-RS

**DECLARATION OF SIMONA A. AGNOLUCCI  
IN SUPPORT OF GOOGLE LLC'S MOTION  
*IN LIMINE* NO. 19 TO PRECLUDE USE OF  
IRRELEVANT AND PREJUDICIAL EVIDENCE  
IN CLOSING ARGUMENTS**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Simona A. Agnolucci, hereby declare as follows:

2       1. I am a partner with the law firm Cooley LLP and am counsel for Defendant Google  
 3 LLC in the above captioned action. I am duly licensed to practice law in the state of California and  
 4 am admitted to practice before this Court. The matters set forth herein are of my own personal  
 5 knowledge, and if called as a witness to testify, I could and would testify to these matters. I submit  
 6 this declaration in support of Google LLC's Motion in Limine No. 19 to Preclude Use of Irrelevant  
 7 and Prejudicial Evidence in Closing Arguments, filed concurrently herewith.

8       2. Attached hereto as **Exhibit A** is a true and correct copy of Aug. 20, 2025 Trial Tr.  
 9 (Vol. 3), page 546.

10       3. Attached hereto as **Exhibit B** is a true and correct copy of Aug. 21, 2025 Trial Tr.  
 11 (Vol. 4), pages 711-720; 749.

12       4. Attached hereto as **Exhibit C** is a true and correct copy of Aug. 26, 2025 Trial Tr.  
 13 (Vol. 6), page 1145.

14       5. Attached hereto as **Exhibit D** is a true and correct copy of Aug. 27, 2025 Trial Tr.  
 15 (Vol. 7), pages 1241-1244.

16       6. Attached hereto as **Exhibit E** is a true and correct copy of Aug. 29, 2025 Trial Tr.  
 17 (Vol. 9), pages 1725-1726; 1755-1761.

18       I declare under penalty of perjury under the laws of the State of California and the United  
 19 States of America that the forgoing is true and correct.

20       Executed on September 1, 2025 at San Francisco, California.

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*/s/ Simona A. Agnolucci*  
 Simona A. Agnolucci